

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

WILLIAM MAYO,	:	No. 1:18-CV-0878
Plaintiff	:	Judge John E. Jones, III
v.	:	Electronically Filed Document
JOHN E. WETZEL,	:	<i>Complaint Filed 04/23/18</i>
Defendant	:	

DEFENDANT’S STATEMENT OF UNDISPUTED MATERIAL FACTS

Defendant hereby submits this following Statement of Undisputed Material Facts in support of his Motion for Summary Judgment, pursuant to Local Rule 56.1. The Defendant submits that there is no issue to be tried in connection with the following undisputed material facts:

1. Plaintiff William Mayo was incarcerated by the Pennsylvania Department of Corrections (“DOC”) at SCI Greene, SCI Fayette, and SCI Smithfield during the incidents alleged in the Complaint. Doc. 1, Introduction.
2. After being involved in an altercation with staff at SCI Greene in November of 2015, the Plaintiff was found guilty of misconduct and placed in solitary confinement for one year. Plaintiff’s Deposition, attached as Exhibit 1, pp. 10-12.
3. The Plaintiff has incurred several additional misconducts since originally being placed in solitary confinement. *Id.* at p. 13; *see also* Doc. 42-2.

4. The Plaintiff found out about being placed on the Restricted Release List (“RRL”) in June of 2016. *Id.* at p. 17.
5. The Plaintiff’s continued placement on the RRL is periodically reviewed. *Id.* at p. 18-19.
6. The Plaintiff, despite being in solitary confinement, still has access to medical treatment and psychiatric treatment. *Id.* at pp. 21-22.

Respectfully submitted,

JOSH SHAPIRO
Attorney General

By: s/ Caleb C. Enerson

CALEB C. ENERSON
Deputy Attorney General
Attorney ID #313832

KAREN M. ROMANO
Acting Chief, Civil Litigation Division

Office of Attorney General
Civil Litigation Section
15th Floor, Strawberry Square
Harrisburg, PA 17120
Phone: (717) 705-5774
cenerson@attorneygeneral.gov

Date: September 13, 2019

Counsel for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

WILLIAM MAYO,	:	No. 1:18-CV-0878
Plaintiff	:	
	:	Judge John E. Jones, III
v.	:	
	:	Electronically Filed Document
JOHN E. WETZEL,	:	
Defendant	:	<i>Complaint Filed 04/23/18</i>

CERTIFICATE OF SERVICE

I, CALEB CURTIS ENERSON, Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on September 13, 2019, I caused to be served a true and correct copy of the foregoing document to the following via First Class, U.S. Mail:

Smart Communications/PADOC
William Mayo, FZ-2947
SCI Smithfield
P.O. Box 999
Huntingdon, PA 16652
Pro Se Plaintiff

s/Caleb Curtis Enerson
CALEB CURTIS ENERSON
Deputy Attorney General